

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

Honorable Joel Schneider,
Magistrate Judge

**MANUFACTURER DEFENDANTS' OMNIBUS MOTION TO QUASH
AND FOR PROTECTIVE ORDER REGARDING PLAINTIFFS'
SUBPOENAS DIRECTED TO THIRD PARTIES**

Manufacturing Defendants (“Defendants”), pursuant this Court’s November 13, 2020 Order (Dkt. 629), hereby file this Omnibus Motion to Quash Plaintiffs’ Third-Party subpoenas (the “Subpoenas”) attached at Exhibit A, and, in the alternative, to quash the Subpoenas identified at Exhibit B in their entirety and to narrow the scope of the Subpoenas identified at Exhibit C, and aver as follows:

1. In support of the instant motion, Defendants will rely on their accompanying Brief, exhibits, and proposed order, submitted herewith.

Dated: December 4, 2020

Respectfully submitted,
By: /s/ Seth A. Goldberg
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